

Dear Federal Communications Commission Member;

I am an amateur radio operator (K9WAV) and a volunteer examiner with both the ARRL and W5YI VECs. I wish to comment on the Petition for Rulemaking (RM-10787) filed by the NCVEC regarding the elimination of Element 1 testing requirement from the FCC amateur radio licensing requirements.

In general, I wish to state my agreement with all items in the NCVEC petition. Additionally, I wish to state my own comments.

The current General and Extra class written examinations contain questions that test the candidate's knowledge of several operating modes, including digital modes such as Packet, RTTY and PSK-31, but there is a separate exam to test morse code proficiency. This tends to favor morse code over other digital modes. Since it is possible to achieve reliable communications with any of these digital modes, I believe the Element 3 and Element 4 exams should be modified to include questions about morse code along with questions about the other digital modes. This will allow candidates with a high level of proficiency in one area but a lower level of proficiency in another to potentially be able to pass their exam.

I recommend the following:

1. Eliminate the Element 1 requirement from the licensing structure.
2. Extend Novice/Tech Plus privileges to all current Technician class operators
3. Modify the Element 3 and 4 exams to include questions that would allow the candidate to demonstrate morse code proficiency

Thank you for your consideration.

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